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September 29, 2020

By ECF and email

The Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

9/29/2020
The request to file a 58-page
brief is granted. SO ORDERED.



Re: United States v. Tagliaferro, et al.
19 Cr. 472 (PAC)

Dear Judge Crotty:

We represent Defendant Salvatore Tagliaferro in the above-referenced matter and write to respectfully request permission to file an oversized memorandum of law in support of Defendant's Motion for Continuance, which is due for filing by tomorrow, September 30, 2020. Specifically, we request permission to file a 58-page brief.

We recognize that this Court generally prefers memorandum of law in support of pretrial motions to be limited to 25 pages, however this instance is unique. Defendant's motion incorporates 15 separate objections to the commencement of trial on December 14, 2020, and a lengthy brief is necessary to preserve a full and complete record in the event of an appeal. The issues range from straightforward issues such as scheduling a trial that is likely to overlap with Christmas, and the fact that this case does not meet the criteria this Court outlined for cases being given priority by the SDNY Ad Hoc Committee on the Return to Trials, to weighty Fifth and Sixth Amendment objections of which all (or almost all) will be issues of first impression in this District.

Accordingly, Defendant Salvatore Tagliaferro, by and through counsel, respectfully requests permission to file an oversized brief in support of Defendant's Motion for Continuance.

Thank you for your time and consideration.

Respectfully submitted,

/S/

Michael K. Bachrach
Richard H. Rosenberg
Attorneys for Defendant Salvatore Tagliaferro

cc: All parties of record (by ECF)